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January 10, 2025

Via ECF:

U.S. Magistrate Judge Miroslav Lovric
United States District Court
Northern District of New York
100 S. Clinton St.
Syracuse, NY 13261

**Re: Hannah Parker v. Cornell University
Case No.: 3:24-cv-00984-GTS-ML**

Magistrate Judge Lovric:

Our firm represents the Plaintiff in this matter. I write pursuant to Your Honor's December 11, 2024, Uniform Pretrial Scheduling Order, and to respectfully request a one-month extension of the deadline to amend the pleadings from January 13, 2025 to February 13, 2025. To date, the parties have exchanged interrogatories and document requests.

By way of background, Plaintiff filed the Complaint in this action on August 12, 2024, alleging violations of New York Labor Law § 740, for whistleblower retaliation and unlawful termination. Defendant filed its Answer on October 7, 2024, and Your Honor referred the case to mediation on December 11, 2024.

With that said, Plaintiff currently has a pending Charge of Discrimination against Defendant with the Equal Employment Opportunity Commission. However, despite multiple requests, the EEOC has not yet issued Plaintiff's Right to Sue Letter.

A one-month extension of the deadline to amend the pleadings will give Plaintiff additional time to obtain her Right to Sue Letter and assert claims against Defendant for race discrimination, gender discrimination, and retaliation under Title VII of the Civil Rights Act of 1964 ("Title VII").

This request would not prejudice Defendant in any way. In fact, it would assist with expediting the matter, as Plaintiff's Title VII claims (over which the Court has federal jurisdiction) can be combined into one single lawsuit and not cause Defendant to litigate two concurrent matters that share a common nucleus of operative facts. Accordingly, Plaintiff respectfully requests a one-month extension of the deadline to amend the pleadings.

We thank Your Honor for Your attention to this matter.

Respectfully,

PHILLIPS & ASSOCIATES, PLLC

/s/ Jesse S. Weinstein, Esq.

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